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Attorneys for INTERVENORS
 HOSPITALITY HOUSE, COALITION ON
 HOMELESSNESS, and FAITHFUL FOOLS

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

COLLEGE OF THE LAW, SAN FRANCISCO, a
 public trust and institution of higher education duly
 organized under the laws and the Constitution of the
 State of California; FALLON VICTORIA, an
 individual; RENE DENIS, an individual;
 TENDERLOIN MERCHANTS AND PROPERTY
 ASSOCIATION, a business association; RANDY
 HUGHES, an individual; and KRISTEN
 VILLALOBOS, an individual,

Plaintiffs,

v.

CITY AND COUNTY OF SAN FRANCISCO, a
 municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF SAM
 DENNISON IN SUPPORT OF
 INTERVENORS' RESPONSE
 TO PLAINTIFFS' MOTION
 TO ENFORCE STIPULATED
 INJUNCTION**

**ASSIGNED FOR ALL
 PURPOSES TO THE
 HONORABLE JON S. TIGAR,
 COURTROOM 6**

Date: 05/23/2024

Time: 2:00 p.m.

Action Filed: 05/04/2020
 TRIAL DATE: (TBD)

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(Counsel for Intervenors continued from previous page)

1 I, Sam Dennison, declare:

2 1. I am the Co-Director of Faithful Fools, a non-profit organization, and an
3 Intervenor in *Hastings College of the Law, et al. v. City & County of San Francisco*: Case No.:
4 4:20-cv-03033-JST. I make this Declaration in support of Intervenor's Opposition to Plaintiffs'
5 Motion to Enforce Stipulated Injunction.

6 2. The facts set forth below are known to me personally. I have first-hand
7 knowledge of these facts. If called as a witness, I could and would testify competently, under
8 oath, to such facts.

9 3. Faithful Fools is rooted in relationship building and participating in shattering
10 myths about those living in poverty. Our work is dynamic and changes according to the needs of
11 the community. Faithful Fools believes in meeting people where they are through the arts,
12 education, advocacy, and accompaniment.

13 4. We have collaborated with Tenderloin residents and artists to stage plays, publish
14 poetry, make films, and create art for activism, expression, and survival. Art speaks to the human
15 condition and sheds light on injustice.

16 5. Our education work is grounded in community-based learning, trauma informed
17 theory, and other practices that emphasize equity. We host learning experiences and community
18 workshops to gain a deeper understanding of poverty and injustice.

19 6. Our primary resource as advocates is building community. Accompaniment is the
20 foundation of community and our form of direct service. We provide support for accessing
21 medical care, housing, and other services for the purpose of stabilizing people on the streets and
22 moving into supportive housing. Over the last 26 years, we have supported dozens of individuals
23 (some with the most difficult mental, physical, and substance use issues) enter housing and
24 remain housed. We have also supported individuals who have been evicted from supportive
25 housing for missed rent payments and other technical infractions regain housing. Our work in
26 this area is often to provide stability for individuals who are destabilized by sweeps, arrests, and
27 eviction from permanent supportive housing.

28 7. The current motion to enforce the stipulated injunction incorrectly equates tent

1 removal with solving the problems associated with poverty and homelessness. The goal of the
2 University through this injunction is to remove tents, without consideration of the rights and
3 lives of unhoused people. The injunction would just move people to other parts of the city, only
4 causing further harm. Our experience, based on 26 years doing this work, is that removing tents
5 is not an effective way to help people exit homelessness and it exacerbates poor mental and
6 physical health conditions of unhoused individuals. This case seems to confuse tents, as a metric
7 of community wellbeing (both housed and unhoused), with rates of poverty and homelessness.

8 8. The focus on reasonable efforts to get to zero tents sidesteps the need for
9 coordinating the services that we know work and which demonstrably improve community
10 wellbeing by decreasing rates of homelessness through reducing the number of people who cycle
11 in and out of housing. Clearing tents without a plan to permanently house chronically unhoused
12 individuals or coordinated services does not work and only causes further harm. The
13 consequence of sweeps have been and will continue to push people into the cycles of poverty
14 that frustrate the residents of the Tenderloin. Sweeps provide an illusion of action while making
15 matters worse for everyone: wasting precious human and fiscal resources, perpetuating chaotic
16 conditions on the streets, and condemning those who want to get off the streets into long term
17 homelessness.

18 9. Based on our experience working with the community, the collaboration that
19 occurred during the COVID-19 pandemic meaningfully reduced the number of tents in the
20 Tenderloin from approximately 450 to less than 60. During this time, work with the City and
21 other programs ensured unhoused people were placed in shelters with appropriate services for
22 their needs, including reasonable accommodations for people with disabilities. The program
23 worked because 1) it was coordinated, 2) it provided meaningful placement, and 3) it approached
24 conditions on the streets strategically. As a result, the vast majority of people who were offered
25 placement in the Shelter in Place hotels accepted placement. First and foremost, people needed
26 places to go that had coordinated services including access to medical care, food, mental health
27 services, and a path to permanent housing. My understanding is that there is no additional federal
28 or state funding for these hotels anymore.

1 10. Once people are adequately placed, they need to transition from temporary
2 placement to permanent housing, health care, and community. They also need access to services
3 that help rebuild skills for employment, developing healthy lifestyles, and sustainable
4 relationships. Without these resources, people exiting homelessness often face problems that
5 they are unable to solve and they return to the streets, either through eviction or because they
6 become isolated.

7 11. Harm occurs when the number of tents is the metric by which we measure
8 improved living conditions in the Tenderloin. Meaningful metrics would include data on
9 violence and chaotic street behaviors, health outcome measures (for housed and unhoused
10 individuals alike), access to and completion of education goals (high school and beyond),
11 reduction of intimate partner violence and sexual assault (on the streets and within low income
12 housing). These metrics should be combined with data on the number of people served by the
13 Department of Homelessness and Supportive Housing, the number of people successful housed
14 in permanent housing from the Tenderloin, and reduction in rates of low-income housing
15 evictions within the Tenderloin. If the court and this injunction remain focused solely on tents,
16 people living in tents will continue to lose access to medical care, stable support services, and the
17 personal belongings that inevitably get thrown away with their tents (including medication for
18 chronic health issues like diabetes and heart disease, photos of loved ones, etc.) while the housed
19 community continues to live with chaotic and unhealthy conditions. With a focus on appropriate
20 metrics, we can make meaningful progress towards improving living conditions in the
21 Tenderloin.

22 12. In our experience the impact of sweeps versus coordinated service outreach points
23 to significant value in the latter approach. University of California at San Francisco research
24 indicates that unhoused people in San Francisco who were moved into Shelter in Place hotels
25 during the pandemic dramatically reduced use of acute health care services; other research
26 further indicates that sweeps decrease the effectiveness of outreach and other services designed
27 to exit people from unsheltered homelessness while failing to reduce crime, public drug use or
28 other detrimental behaviors.

